

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HELENA KRIZEK,

Plaintiff,

-against-

THE QUEENS MEDICAL CENTER,  
DR. CHERYLEE CHANG,  
DR. THOMAS S. GALLACHER,  
DR. NOBUHIRO ARIYOSHI,  
EDQUON LEE, ESQ., MARGARET WILLE  
AND ASSOCIATES LLC.,  
MARGARET WILLE ESQ.,  
WILLIAM A. BORDNER ESQ.,  
DR. HAO CHIH HO, LEGACY OF LIFE  
HAWAII, LIONS EYE BANK OF HAWAII,  
HAWAII STATE DEPARTMENT OF HEALTH,  
DR. CHRISTOPHER HAPPY MEDICAL  
EXAMINER OF HONOLULU, IN HIS  
OFFICIAL & INDIVIDUAL CAPACITY,

Defendant(s).

Case No. 24-cv-07727 (JHR)

**NOTICE OF DEFENDANTS THE QUEEN'S MEDICAL CENTER,  
DR. CHERYLEE CHANG, DR. THOMAS S. GALLACHER AND  
DR. HAO CHIH HO'S MOTION TO DISMISS**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Justin N. Kattan and the exhibit thereto, and all prior pleadings in this case, Defendants THE QUEEN'S MEDICAL CENTER, DR. CHERYLEE CHANG, DR. THOMAS S. GALLACHER, and DR. HAO CHIH HO (collectively, "QMC Defendants"), by and through their counsel, DENTONS US LLP, will move this Court, on a date and time to be determined by the Court, for dismissal of all claims against them based on the expiration of the statute of limitations and other deficiencies in pleading.

Dated: New York, New York  
November 15, 2024

Respectfully submitted,

/s/Justin Kattan

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*GALLACHER and DR. HAO CHIH HO*